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June 20, 2016

Via ECF

Honorable Ronnie Abrams
United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Jason Galanis et al*
16-cr-0371-4 (RA)

Dear Judge Abrams:

This firm represents defendant Hugh Dunkerley in the above-captioned matter. This letter/motion is respectfully submitted on behalf of Mr. Dunkerley to request a two week extension of time for Mr. Dunkerley to satisfy the remaining conditions of his bond.

Mr. Dunkerley was originally arrested in California where the terms of his bond were set. Among other things, that bond was a \$1,000,000 personal recognizance bond secured by \$200,000 worth of security and it was co-signed by a financially responsible party.

On or about June 9, 2016, when Mr. Dunkerley appeared in this District, the terms of the bond in this District were set and they essentially mimicked the provisions of the bond set in California. Through no fault of the defendant whatsoever, there were some delays in moving the security originally deposited into the District Court in California to this District. Accordingly, on June 14, 2016, Your Honor granted a one week extension to allow the defense to meet the remaining conditions of the bond including the transfer of the security.

The Government informs me that the security has now been transferred to this District but that it took some time to accomplish. The Government has also indicated that the financially responsible person who originally signed the bond issued by the District Court in California must now sign the bond set by this Court. The Government has indicated that it wishes to conduct a surety interview before the surety is approved to sign the bond. I do not anticipate a problem with the surety signing the bond issued by this Court, but considering the delays in being able to move the security from California to New York, and to ensure that the remaining condition is met, I am requesting a further extension of time for Mr. Dunkerley's surety to be interviewed and approved, and to sign the bond. I am requesting two weeks, to July 5, 2016, in an excess of caution and I hope that no further extensions will be needed. I have conferred with AUSA Brian Blais and I am informed that the Government consents to this request.

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In light of the above, I respectfully request defendant be given an additional two weeks, to July 5, 2016, to meet the conditions of the bond.

Thank you in advance for Your Honor's consideration in this matter.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Joseph Grob", written in a cursive style.

Joseph A. Grob

cc: AUSA Brian Blais (via email)
AUSA Aimee Hector (via email)
AUSA Rebecca Mermelstein (via email)
Hugh Dunkerley (via email)